

Frequently Asked Questions -- 2000 HOPWA Competition

SuperNOFA for HUD Grant Programs

1. WHAT IS NEW IN THE FY2000 HOPWA COMPETITION?

Under the FY2000 SuperNOFA, the HOPWA competition includes a number of important changes from prior competitions. You should carefully read through the General Section and the HOPWA program section as you prepare an application. The more important changes are listed below:

Targeting of assistance to underserved populations. A new focus in this year's competition will be the selection of Special Projects of National Significance that provide responses to the needs of underserved populations, such as racial and ethnic minority populations, women and persons living in rural areas or others, as described and documented in your proposal. The NOFA provides that HUD will set aside up to 40 percent of the funds allocated to the SPNS category for projects that address this purpose to ensure that many of these model programs are funded. This effort is further described in the NOFA under Section III (D) Targeting Resources to Underserved Populations. HUD is encouraging collaborations among community-based organizations that develop, operate or provide housing with those that provide services or use culturally-sensitive efforts to reach persons in underserved communities. The selection of these model SPNS proposals are expected to show team approaches that will improve the capacity of organization in carrying out housing assistance for this population, reach and assist clients in areas that lack housing and health-care, and use holistic community efforts to coordinate this assistance. From these examples, we hope to learn and share new and better methods to provide responsive housing assistance in areas where health-care, housing and other support is often least available.

Descriptive Budget Form. The application provides a new budget form that will enable you to connect your HOPWA request to your goals. For each budget activity, you will use this form to describe briefly, how the fund will be used to achieve your specific goals and objectives for your proposal. This form must be used by the applicant to show the entire funding requested and by each project sponsor for the part that they will be carrying out. The form should help you describe how you are organizing your proposal and allow HUD to understand its parts and how you plans to use HOPWA funds will result in obtaining the goals and objectives that you are setting. Two examples are shown to help you fill out this information.

Other changes are also made, including a general restating of the criterion on Soundness of Approach. The NOFA clarifies how HUD will review the aspects of your proposal that demonstrate "responsiveness" to unmet needs and those that demonstrate "model qualities" in a service delivery plan for housing and supportive services within an organized framework that

could be replicated in other communities. HUD is encouraging the design of programs that enhance access to needed supportive services, and to the extent possible, to develop housing programs which do not require participation in services as part of the tenancy requirements. If selected for an award, you will be expected to file an initial report on your startup efforts within six months of your selection. Additionally, the NOFA provides all the information needed to file an application (although the application kit remains helpful), forms are available via the internet and forms are in a “fillable” format to help produce your documents.

2. HOW DO YOU DEFINE "SPECIAL PROJECTS OF NATIONAL SIGNIFICANCE?"

Grants for Special Project of National Significance are distinguished from HOPWA formula programs and other competitive grants awarded in non-formula areas under the “long-term” category. SPNS grants selected under this competition are expected to be model proposals that are responsive to described needs in a community, provide elements of a plan to address the housing needs of clients, how supportive services will be provided, the operations of the project and its management oversight. In addition, innovations may be recognized that are beneficial and appropriate to be replicated in other similar localities. The review panel will consider how well your service delivery model offers or expands housing opportunities and housing related services for low-income persons living with HIV/AIDS and their families. Under Exhibit 3, Proposed HOPWA Project/Soundness of Approach, you must describe your planned actions to implement your service delivery model. Examples of SPNS grants from prior competitions can be found under the HOPWA listing on the HUD HOME page on the World Wide Web at <http://www.hud.gov/cpd/hopwahom.html>.

3. WHAT DOES HUD MEAN BY PERFORMANCE MEASURES?

You must use HUD's required performance measures that will show your accomplishment in using HOPWA funds to expand the housing options that benefit low-income persons with AIDS and their families. To measure your performance, after each year of operation, the selected grantees will be asked to report on the number of short-term and permanent housing units that were provided with HOPWA funding, in connection with related supportive services. These measures will demonstrate that your proposed activities resulted in: (a) an increase the amount of housing assistance and related supportive services to low-income persons living with HIV/AIDS and their families; (b) enabled clients to achieve housing stability; and (c) enable clients to access health-care and supportive services.

You may also establish individual goals and objectives for your proposal that may be unique and best reflect your objectives. They should be specific, achievable and measured within set time periods. Your individual goals and objectives should result in possible findings on the successes and lessons learned in undertaking your activities that would be shared with other communities. See the NOFA and application for further detail on how to design the performance measures in your proposal.

4. CAN AN AGENCY SUBMIT A CONTINUUM OF CARE HOMELESS ASSISTANCE APPLICATION AND A HOPWA PROPOSAL WHICH WILL BE LINKED BUT NOT IDENTICAL?

Yes. You can apply for funding under both competitions and other Federal funds that may be available. A HOPWA grant and a Continuum of Care Homeless Assistance grant may serve the same group of clients but with distinct activities that may complement but not duplicate the other HUD-funded activities. If the activities are duplicated in the two applications, please indicate this, as requested in the application in item B of Exhibit 3, and HUD will ensure that an activity will only be funded from one source. However, if the two applications are dependent on each other, they must still compete under the separate competitions and selection in one does not guarantee selection in the other competition. If they do not duplicate the same activities for the same participants, then both may also be funded, if selected.

5. AS AN APPLICANT, WE PLAN TO CARRY OUT ACTIVITIES DIRECTLY. CAN WE QUALIFY FOR BOTH THE GRANTEE'S (3%) AS WELL AS THE SPONSOR'S (7%) ADMINISTRATIVE COSTS?

No. A grantee is limited to using no more than three (3) percent of the grant amount for administering the grant, such as providing general management, oversight, coordination, evaluation and reporting on activities. Please note that costs of staff that are carrying out the program activities may be included in those program activity costs, including prorating costs between categories as may be appropriate. A sponsor is eligible to use up to seven (7) percent of the amount that they receive for the sponsor's administrative costs.

6. CAN A HOPWA PROGRAM BE DESIGNATED TO ASSIST HOMELESS OR OTHER HIGH NEED CLIENTS, SUCH AS PERSONS WITH MULTIPLE-DIAGNOSES?

Yes, to the degree that a program responds to the greater or specialized needs of eligible persons, for example, you can look at homelessness as a greater need and try to serve those in the greatest need as a priority in selecting participants. Program features might also be appropriate for certain clients, such as assistance to address the needs of persons with multiple diagnoses or the use of housing units with larger number of bedrooms to serve large families. However, as required by law and provided under the certifications, programs are required to comply with nondiscrimination and equal opportunity requirements.

7. WE HAVE APPLIED TO IRS FOR A 501(C)(3) DESIGNATION BUT WE HAVE NOT RECEIVED IT YET CAN WE APPLY?

Nonprofit organizations that are either the applicant or a project sponsor must either; (a) have an IRS ruling that provides your tax exempt status under Sec. 501(c)(3) of the IRS Code by the application due date; or (b) provide documentation that shows that the organization satisfies the criteria provided by the statutory definition of non-profit organization found at 42 USC 12902 (13) or your organization cannot serve in those capacities. If you do not have this in hand by the due date, you cannot serve as either the grantee or sponsor, unless one of the alternatives below is applicable to your situation.

The statutory definition reads: "The term "nonprofit organization" means any nonprofit organization (including a State or locally chartered, nonprofit organization) that-- (A) is organized

under State or local laws; (B) has no part of its net earnings inuring to the benefit of any member, founder, contributor, or individual; (C) complies with standards of financial accountability acceptable to the Secretary; and (D) has among its purposes significant activities related to providing services or housing to persons with acquired immunodeficiency syndrome or related diseases."

The Department interprets this definition to include the following: (a) in lieu of a IRS exemption for nonprofits in Puerto Rico, a ruling from the Treasury Department of the Commonwealth of Puerto Rico granting income tax exemption under Section 101 of the Income Tax Act of 1954, as amended (13 LPRA 3101);

(b) that documentation of an IRS ruling of tax exempt status under Sec. 501(c)(4), (6), (7), (9) or (19) is acceptable in lieu of the Sec. 501(c)(3) documentation;

(c) that in lieu of the IRS ruling, a nonprofit organization may provide documentation to evidence that it satisfies the statutory definition; HUD would consider as satisfactory the submission of the following four items: (1) a certification by the appropriate official of the jurisdiction under whose laws the nonprofit organization was organized, that the organization was so organized and is in good standing; (2) documentation showing that the organization is a certified United Way member agency or other documentation that shows that no inurement of benefits will occur; (3) documentation from a CPA or Public Accountant that the organization has a functioning accounting system that is operated in accordance with generally acceptable accounting principles or that a qualifying entity is designated for that activity, or the United Way member agency certification noted in item 2; and (4) a certified copy of the nonprofit organization's articles of incorporation, by-laws, statement of purposes, board of director's resolution or a similar document which includes a provision demonstrating its purpose regarding significant activities for persons living with HIV/AIDS; and

(d) that the term "related diseases" in this definition includes HIV infection.

If your organization does not provide the requested documentation, the organization would not be eligible to receive funds and serve as the grantee or as a project sponsor. However, you could collaborate with eligible nonprofit organizations (e.g. which have the 501(c)(3) designation) or with a government agency that applies for the grant and assist them, for example, in planning for the proposed activities, identifying needs in your community and identifying clients who will be assisted. Eligible grantees and project sponsors may also contract out services that are funded by this grant.

8. RENEWALS. CAN AN EXISTING HOPWA PROGRAM FUNDED FOR UP TO A THREE-YEAR PERIOD THROUGH A PRIOR HOPWA COMPETITIVE GRANT PROGRAM APPLY FOR ADDITIONAL 2000 HOPWA FUNDS TO SUPPLEMENT OR CONTINUE THE SAME PROGRAM?

Yes, and you would describe the need for renewals in Exhibit 2, Need/Extent of Problem. You should especially note if the prior grant is nearing completion of its activities, such that: (1) an existing SPNS or Multiple-Diagnoses Initiative (MDI) grantee may be selected to continue the

same activities, or, to provide additional activities that expand on or modify what the current grant is accomplishing. If an existing competitive grant contained innovative features and the applicant proposes to only continue existing activities, the application would not be viewed as innovative nor receive rating points associated with innovation; however, that application may still be selected based on its other qualities. If HUD determines the project has operated with measurable success and has been supported by HOPWA competitive funds in the year immediately prior to the proposal, the proposal to continue its operations may be given up to 5 points for renewal under factor 2, even if the proposal contains no new innovative approaches. If funds were requested for a one-time activity, such as acquisition, then duplication of that activity would not be appropriate unless other new sites were planned to be added to existing programs.

As an alternative, your proposal may be based on your existing program but propose additional features that benefit recipients; for example, you may want to apply some new things you learned from the program you operate or want to try a new approach, that might be considered innovative and awarded points on that basis.

(2) If your existing project was selected under the Long Term component for grantees in non-formula areas, you could seek additional funds to continue assistance in this competition based on your eligibility for this category and its criteria. If HUD determines that a project has been reasonably successful, a proposal to continue its operations may be given up to 5 points under renewal. If, however, your area now qualifies for a formula allocation, you are not eligible to apply for the Long-term category of funds in this competition; in this case, you may apply under the SPNS category and qualify for renewal points, and/or you could seek formula HOPWA funds that are available from your area's State or city grantee for your project.

For both categories of assistance, an applicant will be deemed to have operated with reasonable success if it evidences in its application that previous HOPWA-funded activities have been carried out and funds have been used in a timely manner, that performance reports were submitted and benchmarks, if any, in program development and operation have been met, and that the number of persons assisted is comparable to the number that was planned at the time of application. For example, if program funds were to be expended during a three year operating period, and the grant agreement was signed two years ago, timely expenditure would mean that approximately two-thirds or more of program funds have been expended under that prior grant.

9. AS A NON-PROFIT ORGANIZATION, MUST WE OBTAIN A CERTIFICATION THAT THE APPLICATION IS CONSISTENT WITH OUR CITY OR STATE'S CONSOLIDATED PLAN?

Yes, the certification of consistency with the area consolidated plan is required. The Department initiated the consolidated planning process to improve our partnership with communities in addressing area needs. The certification is required for city and State applications, including the activities that are carried out by a nonprofit serving as a project sponsor. An exception is made for proposals that plan to undertake activities on a national basis.

10. IF WE REQUEST HOPWA FUNDS FOR SUPPORTIVE SERVICES, WILL THAT IMPACT OUR APPLICATION'S COMPETITIVENESS?

Under this NOFA, funds are to be used to address the housing needs of clients, which may involve supportive services. The Soundness of Approach factor discusses this point. If you clearly demonstrate that the housing needs of eligible persons in the area are addressed through other means, you could apply for services-only activities. However, you can apply for any eligible activity, alone or in combination with others, to help ensure that the purposes of this program are addressed, as noted in the rating criteria.

11. CURRENTLY, OUR CITY IS A HOPWA FORMULA RECIPIENT. DOES THIS ELIMINATE OR DISQUALIFY NON-PROFITS FOR APPLYING FOR COMPETITIVE FUNDS UNDER HOPWA?

No. Nonprofit organizations located in a HOPWA formula area can apply for a HOPWA competitive grant under the SPNS component but would not be eligible under the long-term component which is reserved for non-formula areas. The nonprofit could apply directly or as a sponsor in an application from a State or local government for the SPNS grant. The nonprofit might also seek funding under the formula allocation from the city or State that is serving as the grantee; the FY2000 allocations for \$207.234 million are found at the HUD Home page at www.hud.gov/cpd/cpdalloc.html.

12. CAN A PUBLIC HOUSING AGENCY (PHA) APPLY FOR THESE FUNDS? CAN A PHA SERVE AS A PROJECT SPONSOR?

Yes, as a sponsor, but a PHA can only serve as the applicant/grantee in somewhat unique or very limited cases. A public housing agency that is a functional part of a State or a unit of general local government may serve as the applicant/grantee on behalf of that unit of government. In cases where the PHA is an independent special purpose agency, which is generally the case, the PHA could not serve as the applicant/grantee but may assist another qualified applicant/grantee as a project sponsor. If applying as the grantee, the PHA should specify in the narrative on capacity that it is a functional part of the State or a unit of general local government and meets this eligibility requirement.

13. IS IT PERMISSIBLE FOR APPLICANTS TO REQUEST ADDITIONAL FUNDS TO COLLECT DATA ON PROJECT OUTCOMES UNDER A GRANT?

Yes, applicants are encouraged to apply for funds to ensure that data is collected on the outcomes of project activities, including the model and innovative features. Applications that request up to \$50,000 for data collection activities over the three year operating period, must describe the proposed data collection activities in their application. Typical activities are described in the NOFA under Eligible Activities.

14. IS IT PERMISSIBLE FOR APPLICANTS TO REQUEST FUNDS FOR "OTHER" ACTIVITIES, INCLUDING INNOVATIVE PROPOSALS UNDER A GRANT?

Yes, although the range of HOPWA eligible activities is already extensive, an applicant may describe another activity and receive HUD approval for that activity in this competition.

The applicant should indicate the amount of funds requested for this "other" activity in the space provided in the Budget in Exhibit 3 include a description of the activity. The NOFA provides that HUD will not approve proposals that depend on future decisions on how funds are to be used, for example, a proposal to establish a local request-for-proposal process to select sponsors and activities.

15. HOW CAN I GET FULL CREDIT FOR THE OTHER RESOURCES THAT WILL BE A PART OF THIS PROJECT?

The NOFA notes that to achieve the highest ratings in this factor (10 points of 102 possible), HUD will consider the extent to which resources from other public or private sources match or exceed the amount of HOPWA funds that are being requested. The application provides standard commitment letters in Exhibit 4,, that should be used to document the commitment of other resources, including voluntary contributions of time and effort, that will enrich your proposal. The letters use key elements to demonstrate that the commitment is not conditional or speculative and that the value of the contribution is clear. Commitment of professional time should be valued at the rate used by that person(s) and commitment of time by volunteers is to be valued at a rate of ten dollars (\$10) per hour committed. Funds derived from HOPWA sources, e.g. formula programs, entitlement benefits inuring to the eligible persons or conditional commitments that depend on future fund-raising or actions are not accepted as evidence of leveraged resources.

16. WHAT AREAS ARE ELIGIBLE FOR THE LONG-TERM PROJECTS?

A map of the FY 2000 Formula Jurisdictions is attached that illustrates the 67 metropolitan areas (for cities listed) and 34 States that received FY 2000 formula allocations. The remaining areas (mostly small population States and less urban areas) are the areas for which this category of funding is provided.

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